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for the Substantively Consolidated SIPA Liquidation
of Bernard L. Madoff Investment Securities LLC
and the Estate of Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

**CERTIFICATE OF NO OBJECTION TO TRUSTEE'S MOTION AND
MEMORANDUM TO AFFIRM HIS DETERMINATIONS DENYING CLAIMS OF
CLAIMANTS HOLDING INTERESTS IN PALKO ASSOCIATES, GLORIA JAFFE
INVESTMENT PARTNERSHIP AND THE MILLER PARTNERSHIP**

Irving H. Picard (the "Trustee"), as trustee for the substantively consolidated liquidation
of the business of Bernard L. Madoff Investment Securities LLC under the Securities Investor

Protection Act, 15 U.S.C. § 78aaa *et seq.* and the chapter 7 estate of Bernard L. Madoff, by and through his undersigned counsel, submits this certificate pursuant to Local Bankruptcy Rule 9075-2, and respectfully represents:

1. On June 22, 2016, the Trustee filed the Trustee's Motion and Memorandum to Affirm His Determinations Denying Claims of Claimants Holding Interests in Palko Associates, Gloria Jaffe Investment Partnership and The Miller Partnership (the "Motion") (ECF No. 13538) and the Declaration of Vineet Sehgal in Support of the Trustee's Motion and Memorandum to Affirm His Determinations Denying Claims of Claimants Holding Interests in Palko Associates, Gloria Jaffe Investment Partnership and The Miller Partnership (the "Sehgal Declaration") (ECF No. 13540).

2. The deadline for filing objections to the Motion expired on July 13, 2016 at 4:00 p.m.

3. Notice of the Motion was provided by U.S. Mail, postage prepaid or email to (i) claimants listed on the amended Exhibit 2 annexed to the Sehgal Declaration; (ii) all parties included in the Master Service List as defined in the Order Establishing Notice Procedures (ECF No. 4560); (iii) all parties that have filed a notice of appearance in this case; (iv) the SEC; (v) the IRS; (vi) the United States Attorney for the Southern District of New York; and (vii) SIPC, pursuant to the Order Establishing Notice Procedures (ECF No. 4560).

4. Counsel for the Trustee has reviewed the Court's docket not less than forty-eight (48) hours after expiration of the time to file an objection and to date, no objection, responsive pleading, or request for a hearing with respect to the Motion appears thereon. Additionally, no party has indicated to the Trustee that it intends to oppose the relief requested in the Motion.

5. On July 13, 2016, the Gloria Jaffe Investment Partnership filed a letter with this Court in response to the Motion (the “Jaffe Letter”). (ECF No. 13661).

6. As stated in the Jaffe Letter, the Gloria Jaffe Investment Partnership does not oppose the Motion.

7. Counsel for the Trustee and the Gloria Jaffe Investment Partnership have conferred regarding the additional requests in the Jaffe Letter. As a result, the proposed order has been updated to clarify the grounds for the Motion. Counsel for the Gloria Jaffe Investment Partnership has stated that the revised proposed order resolves the issues raised in the Jaffe Letter.

8. In addition, counsel for the Trustee has confirmed that no adversary proceeding is pending against the Gloria Jaffe Investment Partnership. As such, counsel for Gloria Jaffe Investment Partnership agrees that no reference to the reservation of available defenses in the proposed order is necessary.

9. An electronic copy of a proposed order (the “Order”), that is substantially in the form of the proposed order that was annexed to the Motion, with the above changes, will be submitted to the Court, along with this certificate.

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10. Pursuant to Local Bankruptcy Rule 9075-2, the Trustee respectfully requests that the Order be entered without a hearing, but notes that the Claimants are both pro se and represented by counsel.

Dated: New York, New York
July 21, 2016

By: /s/David J. Sheehan
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Liquidation of Bernard L. Madoff Investment
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